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PUC DOCKET NO. 47461

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APPLICATION OF SOUTHWESTERN ELECTRIC POWER COMPANY FOR CERTIFICATE OF CONVENIENCE AND NECESSITY AUTHORIZATION AND	\$ \$ \$ \$ \$ \$	FULLIS IN THE GOMMISSION FILING CLERK PUBLIC UTILITY COMMISSION
RELATED RELIEF FOR THE WIND CATCHER ENERGY CONNECTION PROJECT	n	OF TEXAS

TEXAS INDUSTRIAL ENERGY CONSUMERS' MOTION TO INTERVENE

Texas Industrial Energy Consumers ("TIEC"), pursuant to the Public Utility Regulatory Act ("PURA"), Tex. Util. Code Ann. §§ 11.001 et seq., and §§ 22.102, 22.103(b), and 22.104 of the Commission's Rules of Practice and Procedures, files this Motion to Intervene in the above-referenced proceeding, respectfully showing as follows:

1. The names of TIEC's authorized representatives are:

Mr. Rex D. VanMiddlesworth Mr. Benjamin Hallmark Mr. James Zhu Thompson & Knight LLP 98 San Jacinto Blvd., Suite 1900 Austin, Texas 78701 (512) 469.6100 (512) 469-6180 Fax

All pleadings and other documents should be served upon TIEC's authorized representatives.

- 2. TIEC is an association of industrial consumers of electricity, and TIEC's principal purpose is to address electricity matters in proceedings before the Commission. TIEC members for this case include United States Steel.
- 3. On July 31, 2017, SWEPCO filed a petition seeking Certificate of Convenience and Necessity ("CCN") authorization for the Wind Catcher Energy Connection Project.
- 4. TIEC member companies own and operate industrial facilities in the SWEPCO service territory and purchase electricity from SWEPCO. Therefore, TIEC members may be

financially impacted by determinations the Commission makes regarding SWEPCO's application. Accordingly, TIEC has a justiciable interest in this proceeding and should be granted intervenor status.

5. For the above stated reasons, TIEC respectfully requests that the Administrative Law Judge grant this Motion to Intervene and admit TIEC as an intervenor in this proceeding for all purposes.

Respectfully submitted,

THOMPSON & KNIGHT LLP

Rex D. VanMiddlesworth State Bar No. 20449400 Benjamin Hallmark State Bar No. 24069865 98 San Jacinto Blvd., Suite 1900

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ATTORNEYS FOR TEXAS INDUSTRIAL ENERGY CONSUMERS

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CERTIFICATE OF SERVICE

I, Ben Hallmark, Attorney for TIEC, hereby certify that a copy of TIEC's Motion to Intervene was served on all parties of record in this proceeding on this _____ day of August, 2017 by electronic mail, facsimile and/or First Class, U.S. Mail, Postage Prepaid.

Ben Hallmark